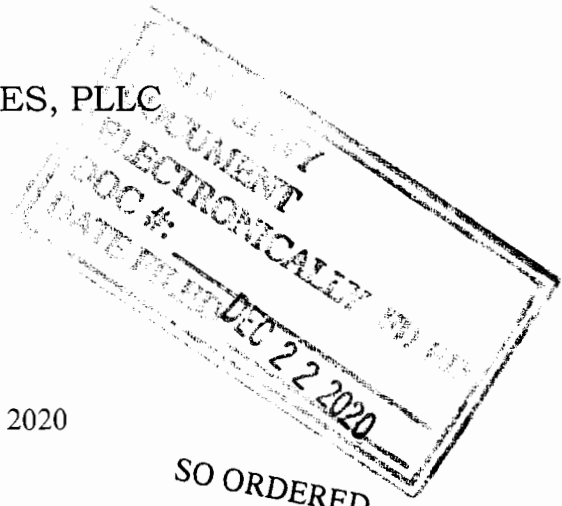


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VIA ECF

December 21, 2020

The Honorable George B. Daniels
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Kevin Haynes
20 Cr. 05 (GBD)

DEC 22 2020

SO ORDERED
The sentencing is adjourned
from January 13, 2021 to May
12, 2021 at 10:00 a.m.

George B. Daniels
HON. GEORGE B. DANIELS

Dear Judge Daniels:

I am the attorney for Kevin Haynes, who is scheduled for sentencing on January 13, 2020. Pursuant to the Standing Order of Judge McMahon suspending in-person operations in the Southern District of New York until January 15, 2021, Mr. Haynes' sentencing would have to be conducted remotely. See: In re Coronavirus/COVID 19 Pandemic, M-10-468 (CM). I have conferred with Mr. Haynes and he wishes to be sentenced in person at the Courthouse. I respectfully request that sentencing be adjourned for a reasonable time to allow for an in-person sentencing and that the dates for sentencing submissions be adjusted to conform with the new sentencing date. The Government does not object to this request.

Mr. Haynes has been incarcerated for 18 months. Probation has recommended a 60 month sentence, representing a 24 month downward variance from the 84 month low end of the advisory guidelines. I believe a four month adjournment would not be unreasonable, but defer to the Court of course on what constitutes a reasonable adjournment.

There has been one prior request for an adjournment of sentence to allow for additional consultations between my client and me, and for me to obtain additional information relevant to sentencing during the COVID-19 Pandemic.

Respectfully submitted,

Scott B. Tulman

SBT:ss
cc: Sarah Mortazavi, Esq., AUSA